

United States District Court
DISTRICT OF NEW HAMPSHIRE

United States of America

v.

Ian Freeman

CASE NUMBER: 1:21-cr-00041-JL-01

RESPONSE TO GOVERNMENT'S OBJECTION

The Government's overstated opening paragraph of their objection presumes that they have already gone to trial, called dozens of witnesses and produced compelling evidence. Their journey has not yet left the starting line. To proclaim that Ian Freeman is a "sophisticated criminal" when no trial has taken place and when the Government is aware that he has nothing but a minor misdemeanor criminal history borders on absurdity.

The Government fails to express the reality that Freeman was never advised by any governmental authority to cease and desist his activity. Freeman openly operates his business and was aware of federal investigations. No banking authority, whether it be State or Federal interfered with the activity engaged in.

With regard to "disclosures made to probation," Freeman answered the questions that were asked. At no time was a work sheet presented to him. At no time was there any question posed that referred specifically to cryptocurrency possession he would have under his control.

The Government is keenly aware that Freeman is a non-violent man that has never failed to appear when required for any Court proceeding.

With regard to the standard of review: conditions can be set for Ian Freeman that would guarantee his appearance and the safety of himself and the community.

1. The offense is not an offense where there is a presumption of Pre-Trial Detention. It is a non-violent financial offense.

2. The Government claims it has overwhelming evidence of guilt even though the U.S. Attorney's Office has never presented a cryptocurrency case in this district.

3. The history and characteristics of Ian Freeman are that he has a misdemeanor criminal history and has lived openly and operated openly in the Keene, NH area for over fifteen (15) years.

4. He poses no danger to the community, a fact the Government is aware of as he has been the focus of their investigation for least least five (5) years without any agency requesting formally or informally for him to cease and desist his activity or the activity of the Shire Free Church.

In essence, the Government's objection is a laundry list of prosecution theories yet to be presented by witnesses and tested by cross examination.

The Government continues to emphasize Freeman's convictions. The obstruction conviction was him standing in front of a Keene Police cruiser during and after a protest. The resisting arrest does not exist as he was found not guilty by a Cheshire County jury on that minor misdemeanor.

This Court has allowed four (4) co-defendants to remain at liberty while preparing for and awaiting trial. Certainly, conditions can be tailored for Mr. Freeman, if such a task was accomplished for the individuals allowed to enjoy the presumption of innocence. The Government has projected an April or May 2022 trial date. That means keeping a non-violent man locked up for over a year on a financial offense when he has no history of failing to appear. Such a request is unwarranted and unsubstantiated.

Additionally, Freeman has been involved in his community as a substantial supporter of the Hundred Nights homeless shelter (*see* Attached letter as Attachment "A"). Many may disagree with his policies, his involvement in the Shire Free Church, his exercise of his 1st Amendment Rights as set forth in his radio shows or his cryptocurrency activity. None of these aspects of his life should deny him the ability to be at liberty now in order to prepare with his attorney for trial; a trial anticipated to be "complex" with over 100,000 documents for review. A trial that will be the first of its kind in the District of New Hampshire.

April 23, 2021

Date

Signature

Mark L. Sisti

Print Name

387 Dover Road

Address

Chichester, NH 03258

City

State

Zip Code

(603) 224-4220

Phone Number

CERTIFICATION

I hereby certify that a copy of this appearance was forwarded to Assistant United States Attorneys Georgiana MacDonald, Seth Aframe, and John Kennedy, electronically through EFC on April 23, 2021.

April 23, 2021

Date

Signature

Mark L. Sisti

Print Name

Attachment “A”



HUNDRED NIGHTS INC.

Reaching for the Warmth of Home

Emergency Shelter & Open Doors Resource Center

P.O. Box 833

17 Lamson Street

Keene, NH 03431

(603) 352-5197

www.hundrednightsinc.org

Tax ID: 45-2798171

Mark Sisti

Sisti Law Offices

info@sistilawoffices.com

Dear Mr. Sisti,

I am writing to provide you, and the court, with some information about the relationship that Hundred Nights has had over the years with Ian Freeman.

Hundred Nights, Inc. is a non-profit in Keene, NH, that provides emergency shelter and housing focused case management for those at risk of or experiencing homelessness. We were founded in 2010. I came on board as Executive Director in 2013.

At that time, in 2013, I discovered that there were several donors already established as monthly donors through the PayPal portal. Mr. Freeman was one of them; he began donating \$10.00 per month in January, 2013, and he has continued to be a monthly donor through the present time.

Mr. Freeman was also one of the first general operating support donors to Hundred Nights, giving \$500.00 on November 8, 2010, \$700.00 on December 23, 2010, \$500.00 on March 18, 2013 and \$500.00 on August 3, 2013. He then became an event sponsor of our Annual Spring Dance with donations of \$1,000.00 on December 9, 2013, January 23, 2015 and January 14, 2016.

In addition to all of the above, Mr. Freeman donated items to our December Annual Holiday Auction on two occasions in 2017 and 2018.

Please see that attached printout from our Little Green Light Donor Data Base for confirmation of the above amounts.

Best Regards,

Mindy Cambiar

Executive Director



The mission of Hundred Nights, Inc. is to provide shelter and crisis related services to the displaced or homeless. Our goal is to collaborate with and enable the community to see, hear and support those among us who are equally deserving of dignity but who currently lack the means to live independently. Our vision is a community whose members, regardless of means, are equally valued and supported.

Hundred Nights Inc

FreeTalkLive-2021-04-23.pdf

Constituent Giving History

Printed on: 4/23/21

Organization details: Free Talk Live

Free Talk Live
 Ian Freeman Free Talk Live
 Work: (941) 371-5574
 Mobile: (603) 852-8118
 ian@freetalklive.com

LGL ID
 946792
Contact Name
 Ian Freeman
Salutation
 Ian
Alt. Salutation
 Ian

Giving summary

Total \$6,210
Largest \$1,000 gift on 12/9/13
Last \$10 gift on 4/4/21
First \$500 gift on 11/8/10
Gifts 109 / \$6,210
Status Active Donor, Top 100 Donor

Next Steps

Not available

Goals

Not available

Full Gift History

Date	Type	Amount	Campaign	Fund	Appeal	Event
4/4/21	Gift	\$10	Annual Giving	Unrestricted Annual Giving	Monthly PayPal Donor	
3/4/21	Gift	\$10	Annual Giving	Unrestricted Annual Giving	Monthly PayPal Donor	
2/4/21	Gift	\$10 (PayPal #5RB22961ME1839412)	Annual Giving	Unrestricted Annual Giving	Monthly PayPal Donor	
1/4/21	Gift	\$10 (PayPal #14C63259KA0215408)	Annual Giving	Unrestricted Annual Giving	Monthly PayPal Donor	
12/4/20	Gift	\$10 (PayPal #2U134077J2652084H)	Annual Giving	Unrestricted Annual Giving	Monthly PayPal Donor	
11/4/20	Gift	\$10 (PayPal #17T39865NK960882M)	Annual Giving	Unrestricted Annual Giving	Monthly PayPal Donor	
10/4/20	Gift	\$10 (PayPal #43416289F5632914H)	Annual Giving	Unrestricted Annual Giving	Monthly PayPal Donor	
9/4/20	Gift	\$10	Annual Giving	Unrestricted Annual Giving	Monthly PayPal Donor	
8/4/20	Gift	\$10	Annual Giving	Unrestricted Annual Giving	Monthly PayPal Donor	
7/4/20	Gift	\$10	Annual Giving	Unrestricted Annual Giving	Monthly PayPal Donor	
6/4/20	Gift	\$10	Annual Giving	Unrestricted Annual Giving	Monthly PayPal Donor	
5/4/20	Gift	\$10	Annual Giving	Unrestricted Annual Giving	Monthly PayPal Donor	
4/4/20	Gift	\$10	Annual Giving	Unrestricted Annual Giving	Monthly PayPal Donor	
3/4/20	Gift	\$10	Annual Giving	Unrestricted Annual Giving	Monthly PayPal Donor	
2/4/20	Gift	\$10	Annual Giving	Unrestricted Annual Giving	Monthly PayPal Donor	
1/4/20	Gift	\$10	Annual Giving	Unrestricted Annual Giving	Monthly PayPal Donor	
12/4/19	Gift	\$10	Annual Giving	Unrestricted Annual Giving	Monthly PayPal Donor	
11/4/19	Gift	\$10	Annual Giving	Unrestricted Annual Giving	Monthly PayPal Donor	
10/4/19	Gift	\$10	Annual Giving	Unrestricted Annual Giving	Monthly PayPal Donor	

Date	Type	Amount	Campaign	Fund	Appeal	Event
9/4/19	Gift	\$10	Annual Giving	Unrestricted Annual Giving	Monthly PayPal Donor	
8/4/19	Gift	\$10	Annual Giving	Unrestricted Annual Giving	Monthly PayPal Donor	
7/4/19	Gift	\$10	Annual Giving	Unrestricted Annual Giving	Monthly PayPal Donor	
6/4/19	Gift	\$10	Annual Giving	Unrestricted Annual Giving	Monthly PayPal Donor	
5/6/19	Gift	\$10	Annual Giving	Unrestricted Annual Giving	Monthly PayPal Donor	
4/4/19	Gift	\$10	Annual Giving	Unrestricted Annual Giving	Monthly PayPal Donor	
3/2/19	Gift	\$10	Annual Giving	Unrestricted Annual Giving	Monthly PayPal Donor	
2/4/19	Gift	\$10	Annual Giving	Unrestricted Annual Giving	Monthly PayPal Donor	
1/4/19	Gift	\$10	Annual Giving	Unrestricted Annual Giving	Monthly PayPal Donor	
12/4/18	Gift	\$10	Annual Giving		Monthly PayPal Donor	
11/4/18	Gift	\$10	Annual Giving		Monthly PayPal Donor	
10/4/18	Gift	\$10	Annual Giving	Unrestricted Annual Giving	Monthly PayPal Donor	
9/4/18	Gift	\$10	Annual Giving			
8/4/18	Gift	\$10	Annual Giving			
7/4/18	Gift	\$10	Annual Giving			
6/4/18	Gift	\$10	Annual Giving			
5/4/18	Gift	\$10	Annual Giving			
4/4/18	Gift	\$10	Annual Giving			
3/4/18	Gift	\$10	Annual Giving			
2/4/18	Gift	\$10	Annual Giving			
1/4/18	Gift	\$10	Annual Giving			
12/4/17	Gift	\$10				
11/4/17	Gift	\$10				
10/4/17	Gift	\$10				
9/4/17	Gift	\$10				
8/4/17	Gift	\$10				
7/4/17	Gift	\$10				
6/4/17	Gift	\$10	Annual Giving	Unrestricted Annual Giving	Monthly PayPal Donor	
5/4/17	Gift	\$10	Annual Giving	Unrestricted Annual Giving	Monthly PayPal Donor	
4/4/17	Gift	\$10	Annual Giving	Unrestricted Annual Giving	Monthly PayPal Donor	
3/4/17	Gift	\$10	Annual Giving	Unrestricted Annual Giving	Monthly PayPal Donor	
2/4/17	Gift	\$10	Annual Giving	Unrestricted Annual Giving	Monthly PayPal Donor	
1/4/17	Gift	\$10	Annual Giving	Unrestricted Annual Giving	Monthly PayPal Donor	

Date	Type	Amount	Campaign	Fund	Appeal	Event
12/4/16	Gift	\$10	Annual Giving	Unrestricted Annual Giving	Monthly PayPal Donor	
11/4/16	Gift	\$10	Annual Giving	Unrestricted Annual Giving	Monthly PayPal Donor	
10/4/16	Gift	\$10	Annual Giving	Unrestricted Annual Giving	Monthly PayPal Donor	
9/4/16	Gift	\$10	Annual Giving	Unrestricted Annual Giving	Monthly PayPal Donor	
8/4/16	Gift	\$10	Annual Giving	Unrestricted Annual Giving	Monthly PayPal Donor	
7/4/16	Gift	\$10	Annual Giving	Unrestricted Annual Giving	Monthly PayPal Donor	
6/4/16	Gift	\$10	Annual Giving	Unrestricted Annual Giving	Monthly PayPal Donor	
5/4/16	Gift	\$10	Annual Giving	Unrestricted Annual Giving	Monthly PayPal Donor	
4/4/16	Gift	\$10	Annual Giving	Unrestricted Annual Giving	Monthly PayPal Donor	
3/4/16	Gift	\$10	Annual Giving	Unrestricted Annual Giving	Monthly PayPal Donor	
2/4/16	Gift	\$10	Annual Giving	Unrestricted Annual Giving	Monthly PayPal Donor	
1/14/16	Gift	\$1,000				
1/4/16	Gift	\$10	Annual Giving	Unrestricted Annual Giving	Monthly PayPal Donor	
12/4/15	Gift	\$10	Annual Giving	Unrestricted Annual Giving	Unsolicited	
11/4/15	Gift	\$10	Annual Giving	Unrestricted Annual Giving	Unsolicited	
10/4/15	Gift	\$10				
9/4/15	Gift	\$10				
8/4/15	Gift	\$10				
7/4/15	Gift	\$10				
6/4/15	Gift	\$10				
5/4/15	Gift	\$10				
4/4/15	Gift	\$10				
3/4/15	Gift	\$10				
2/4/15	Gift	\$10				
1/23/15	Gift	\$500				
1/23/15	Gift	\$500				
1/4/15	Gift	\$10				
12/4/14	Gift	\$10				
11/4/14	Gift	\$10				
10/4/14	Gift	\$10	Annual Giving	Unrestricted Annual Giving	Unsolicited	
9/4/14	Gift	\$10				
8/4/14	Gift	\$10				
7/25/14	Gift	\$10				
6/7/14	Gift	\$10				

Date	Type	Amount	Campaign	Fund	Appeal	Event
5/4/14	Gift	\$10				
4/4/14	Gift	\$10				
3/4/14	Gift	\$10				
2/4/14	Gift	\$10				
1/25/14	Gift	\$10				
12/15/13	Gift	\$10				
12/9/13	Gift	\$10				
12/9/13	Gift	\$1,000				
11/15/13	Gift	\$10				
10/15/13	Gift	\$10				
9/15/13	Gift	\$10				
8/15/13	Gift	\$10				
8/3/13	Gift	\$500				
7/15/13	Gift	\$10				
6/15/13	Gift	\$10				
5/15/13	Gift	\$10				
4/15/13	Gift	\$10				
3/18/13	Gift	\$500				
3/15/13	Gift	\$10				
2/15/13	Gift	\$10				
1/15/13	Gift	\$10				
12/23/10	Gift	\$700				
11/8/10	Gift	\$500				